



DEPARTMENT OF THE NAVY

SOUTHERN DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
2155 EAGLE DR., P. O. BOX 10068  
CHARLESTON, SC 29401-1068

SUPERFUND BRANCH

PLEASE ADDRESS REPLY TO THE  
COMMANDING OFFICER, NOT TO  
THE SIGNER OF THIS LETTER.  
REFER TO:

5090  
Code 1142/11

15 NOV 1985

Mr. Robert E. Hanneschlager  
Superfund Enforcement Branch  
United States EPA, Region VI  
1201 Elm Street  
Dallas, TX 75270

~~MC GREGOR NAVAL WEAPONS~~  
~~TX 917 0024 708~~

Dear Mr. Hanneschlager,

In response to your 7 October 1985 letter concerning the Confirmation Study and Evaluation of Remedial Alternatives Report (Report), NWIRP McGregor, Texas, the following comments are provided:

Your first comment stated that the construction and placement of the monitor wells are inadequate to determine groundwater flow direction or information regarding potential contaminate migration. Further you stated that one upgradient and at least three downgradient wells should be installed at the Area G Pesticide Site (Site). Table 3-13 of the Report shows that the groundwater elevation in monitor well 1(D) was consistently higher than that in monitor well 2(D). This fact coupled with the orientation of the wells with respect to the site proves that monitor well 2(D) is downgradient of the site. This is further reinforced by the fact that shallow groundwater usually moves from topographic highs to topographic lows following the general contours of the ground surface. This is the case at the Pesticide Site with the contours of the land sloping gently to the east. We feel that the monitor wells in place are sufficient to monitor the site and because no detectable concentrations of pesticides have been found to date the groundwater is not being adversely affected.

Your second comment stated that the post-closure monitoring period of three years is inadequate and that in keeping with RCRA requirements for hazardous waste landfills, a thirty year post-closure monitoring period should be instituted. Because the pesticide site is a historical site resulting from past waste disposal practices, we feel that it is regulated under CERCLA. Therefore the RCRA requirement for thirty years of groundwater monitoring would not be required. Since the Report was finalized, we have decided to monitor the groundwater at the site for five years. If no groundwater contamination is found during the five years, monitoring would be suspended until such time that it is deemed necessary (i.e.: cracks in cap are found, flood, earthquake. etc).

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We appreciate your comment concerning sampling point 11-A-4. The location is a hot spot and it was an oversight on our part to not include it in Figure 5-1 of the Report. Be assured that the area of contamination at and around this point will be excavated and included in the capped area.

As in all areas where soils are to be excavated, verification samples will be taken at this location after excavation efforts to verify whether all contamination has been removed.

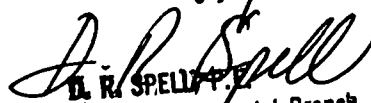
We appreciate your comments on the report although we feel that our methodology for closing this site meets all requirements of CERCLA and the National Contingency Plan (NCP).

Further, as discussed in our 26 September 1985 letter to Mr. James T. Highland, the Texas Department of Water Resources (TDWR), now the Texas Water Commission (TWC), approved the Report and the selected alternative for remedial action. TWC further advised that we proceed directly to detailed plans and specifications to close the site. We are currently proceeding with plans and specifications to close the site and will forward a copy to your office when complete.

Your letter also stated that you had not received a copy of the report "Groundwater Quality Assessment, Area P" as requested in your letter of 10 April 1984. We believe this comment is in reference to Area F as there is not an Area P Plan. A Groundwater Quality Assessment was conducted at Area F in conjunction with the closure of three surface impoundments. The final assessment is enclosed as attachment 1.

Should you need further information, please do not hesitate to call Mr. A. L. Chestnut at (803) 743-5510.

Sincerely,

  
D. R. SPELLMAN  
Head Environmental Branch

Copy to: (w/o encl)  
EPA, Region VI (Jim Highland)  
ERM Southwest (Harry Little)  
Baker & Botts (Larry Feldcamp)  
Ciba Geigy (Don Paulson)  
OGC (Martin Robertson)  
Dept. of Justice (Newman Reed)  
Hercules, Inc. (Kathleen Anglin)  
NAVAIRSYSCOM (Mr. Bob Booth)